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**From:** Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Sent:** 3/3/2021 2:07:12 AM  
**To:** Ozmen, Shamus [Ozmen.Shamus@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]  
**CC:** Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Lara, Rhina [Lara.Rhina@epa.gov]  
**Subject:** RE: OPP IO Review: Questions from Florida Department of Agriculture and Consumer Services

Yes, I reviewed. Thanks! Sorry for the late reply.

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**From:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>  
**Sent:** Tuesday, March 2, 2021 6:51 PM  
**To:** Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** RE: OPP IO Review: Questions from Florida Department of Agriculture and Consumer Services

Hi Ed – Yes, Kimberly has been amazing at coordinating with us on answering these questions.

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**From:** Messina, Edward <Messina.Edward@epa.gov>  
**Sent:** Tuesday, March 2, 2021 6:22 PM  
**To:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** RE: OPP IO Review: Questions from Florida Department of Agriculture and Consumer Services

Looks good. Assuming Kimberly reviewed?

Ed

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Ed Messina, Esq.  
Acting Office Director  
Office of Pesticide Programs  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
p: (703) 347-0209

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**From:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>  
**Sent:** Tuesday, March 2, 2021 6:19 PM  
**To:** Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** OPP IO Review: Questions from Florida Department of Agriculture and Consumer Services

Hi – For review below are the responses to questions from Florida Department of Agriculture and Consumer Services. We can funnel these back through Allison (pesticidepackaging inbox) unless you have a different direction.

Thanks,  
Shamus

1. ***What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response? When can they expect the registrant to reach out? Will the product be picked up or returned to the company? Will the product be replaced?***

To minimize risks to public health and the environment, EPA asked states with existing stock of the mosquito product that is stored in HDPE containers to “red tag” that inventory and hold for now. The pesticide manufacturer has also notified all of its customers regarding management of the product and has voluntarily stopped shipments of all products in fluorinated HDPE containers.

2. ***Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond agrichemical industry such as in the food industry or homeowner products? Can a list be provided?***

EPA is continuing to work to understand the extent and significance of the potential for PFAS contamination and continues to be in close communication with the Food and Drug Administration (FDA) and the United States Department of Agriculture (USDA).

3. ***Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?***

EPA has no comment at this time.

4. ***Is there a Safety Data Sheet (SDS) for the packaging?***

Safety Data Sheets (SDS) are required by the Hazard Communication Standard (29 CFR 1910.1200(g)), which is implemented by the Department of Labor's Occupational Safety and Health Administration (OSHA). The requirement is intended for hazardous chemicals, which are materials/products used by other people/companies. Packaging is not an intended target of the Hazard Communication Standard, but questions related to SDS requirements should be directed to OSHA.

5. ***Is the PFAS contamination confirmed to be linked to the fluorination process? If so, what are the alternatives to fluorination or alternative types of rigid containers available to the agrichemical industry?***

Over the coming weeks, EPA will be providing additional information that answers this question.

6. ***After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment?***

The PFAS detections in rinsate from the tested containers does not represent PFAS concentrations in the environment or human exposure to PFAS. EPA is still working to investigate and assess the risk concerns associated with PFAS making it into the environment as a result of fluorinated HDPE containers.

7. ***Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers?***

EPA is early in its investigation of the various fluorination processes and the potential for them to produce PFAS. The agency will explore the available alternatives to fluorinated HDPE containers if testing determines that fluorinated HDPE containers cannot be used going forward.

8. ***What is the position of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries?***

EPA is not in the position to speak to the policies or decisions of other governments.

9. ***What will this mean for export/import of agrichemical products? What will this mean for import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?***

EPA is early in its investigation and assessment of potential impacts on health or the environment. The agency is actively working with the FDA, the USDA, and industry and trade organizations to raise awareness of this emerging issue and discuss expectations of product stewardship.

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**From:** Messina, Edward <Messina.Edward@epa.gov>

**Sent:** Thursday, February 25, 2021 3:49 PM

**To:** Dennis, Allison <Dennis.Allison@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>

**Cc:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>

**Subject:** FW: PFAS in Pesticide Packaging

Fyi – how close are we to responding to these questions?

Ed

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Ed Messina, Esq.  
Acting Office Director  
Office of Pesticide Programs  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
p: (703) 347-0209

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**From:** Messina, Edward

**Sent:** Thursday, February 25, 2021 3:45 PM

**To:** Katims, Casey <Katims.Casey@epa.gov>

**Subject:** RE: PFAS in Pesticide Packaging

## Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)	We are primarily focused on making sure that the fluorinated containers no longer contain PFAS or are discontinued. A lot of stakeholder outreach and industry stewardship activities are happening right now.
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Ed Messina, Esq.  
Acting Office Director  
Office of Pesticide Programs  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
p: (703) 347-0209

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**From:** Katims, Casey <Katims.Casey@epa.gov>

**Sent:** Thursday, February 25, 2021 2:14 PM

**To:** Messina, Edward <Messina.Edward@epa.gov>

**Subject:** FW: PFAS in Pesticide Packaging

**Importance:** High

Ed - FYI

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**From:** Blevins, John <Blevins.John@epa.gov>  
**Sent:** Thursday, February 25, 2021 10:38 AM  
**To:** Freedhoff, Michal <Freedhoff.Michal@epa.gov>  
**Cc:** Katims, Casey <Katims.Casey@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; Jones, Aaryn <Jones.Aaryn@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>  
**Subject:** PFAS in Pesticide Packaging  
**Importance:** High

Michal,

I hope all is well. I wanted to reach out and make sure that you were aware of some specific concerns from R4 states and *stakeholders* concerning EPA's January 14, 2021 press release on PFAS in Pesticide Packaging. As background, the Region held a listening session with our State stakeholder and shared our notes with your staff and others in HQ.

The Florida Department of Agriculture and Consumer Services (FDACS) submitted several questions to the EPA "Pesticide Packaging" mailbox. I know that your staff has been working on the issues identified and are swamped. It is my understanding that thus far the state has received one response. Immediately below is a summary of the initial questions (2/6/21), the EPA Pesticide Packaging mailbox response (2/23/21), and the subsequent questions asked by FDACS (2/23/21) below:

- What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response? (2/6/21)
  - Pesticides mailbox response on 2/23/21: *States with existing stock of Anvil 10+10 that is stored in HDPE containers should red tag that inventory and hold for now. Clarke Mosquito has informed EPA that it will reach out to all its customers regarding management of its Anvil 10+10 product.*
- Additional Qs from FL DACS on 2/23/21:
  - *In reference to the first question, our stakeholders would like more detail on the registrant's response. When can they expect the registrant to reach out? Will the product be picked up or returned to the company? Will the product be replaced?*
  - Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond agrichemical industry such as in the food industry or homeowner products? Can a list be provided?
  - Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?
  - Is there a Safety Data Sheet (SDS) for the packaging?
  - Is the PFAS contamination confirmed to be linked to the fluorination process? If so, what are the alternatives to fluorination or alternative types of rigid containers available to the agrichemical industry?
  - After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment?

- Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers?
- What is the position of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries?
- What will this mean for export/import of agrichemical products? What will this mean import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?

With growing season rapidly approaching FL, and our other States, our stakeholders would like to make informed pesticide purchases and/or may already have existing stocks of potentially impacted pesticides and are uncertain of the best path forward.

We appreciate your Office's work on this complex matter and will broadly share any updates with our Regional stakeholders.

Welcome aboard, and if you have any questions, give me a call.

John

John Blevins  
Acting Region 4 Regional Administrator  
US EPA Region 4  
980 College Station Road  
Athens GA 30605

214-437-9810 cell  
706-355-8549 office  
404-562-8231 (Atlanta Office number)

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